



Hollidaysburg Sewer Authority

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Memorandum

TO: DEP Water Planning Office
Water Docket, EPA
US Senator Robert Casey, Jr.
Congressman Bill Shuster
State Senator John Eichelberger, Jr.
State Representative Jerry Stern
Blair County Planning Commission
Blair County Commissioners

FROM: Regis Nale, Chairman *Regis Nale*

DATE: November 5, 2010

SUBJECT: Chesapeake Bay Total Maximum Daily Loads (TMDL's)
Proposed Backstop TMDL's for Municipal Point Sources in Pennsylvania.
Susquehanna River Watershed

The Hollidaysburg Sewer Authority is located in Blair County, Pennsylvania and owns, operates and maintains a wastewater treatment plant that serves portions of four (4) townships as well as the entire Borough of Hollidaysburg. The plant is rated for 6 million gallons per day. The Authority recently was re-issued its NPDES permit (PA # 0043273) on September 27, 2010. That permit contains requirements to achieve annual cap loading limits of 111,513 pounds of total nitrogen (TN) and 14,612 pounds of total phosphorous (TP) beginning on October 1, 2012.

The Authority has completed its planning studies for achieving the above annual cap loading limits, which were part of the Commonwealth of Pennsylvania's Chesapeake Bay Tributary Strategy. Design of new plant facilities is currently in progress. In fact the Authority filed an application with PaDEP for a Part II Water Quality Management Permit for the construction of the proposed facilities on October 29, 2010.

To achieve compliance with the newly issued NPDES permit, the Authority was proposing to upgrade its main wastewater treatment process to provide enhanced TN removals, build new sludge management facilities and purchase TP credits long term. Current estimated construction cost of the project is \$8 million dollars. The Authority's sewer customers are facing a monthly increase in the fixed portion of their monthly sewer bill of at least \$5.00 per month just to cover the debt service on the anticipated construction loans. Increased operations and maintenance costs will add even more to the monthly sewer bill.

November 5, 2010

Page 2

Recently the U.S. EPA has proposed to institute "Backstop TMDL's" on municipal and industrial point source sewage treatment plants in the portions of Pennsylvania that are tributary to the Chesapeake Bay. The U.S. EPA assigned the Hollidaysburg plant the following "Backstop TMDL" limits:

<u>Pollutant Parameter</u>	<u>Backstop TMDL</u>	<u>Resultant Average Concentration @ 6.0 mgd</u>
Total Nitrogen (TN)	9,804 lbs/yr	0.53 mg/l
Total Phosphorous (TP)	350 lbs/yr	0.019 mg/l
Total Sediment (TS)	0.025823 mil/lbs/yr (25,823 lbs/yr)	1.4 mg/l

The resultant average concentrations at the design plant flow of 6 million gallons per day (6 mgd) are much lower than the U.S. EPA's own limits of current technology for TN and TP. Those limits of current technology are 3.0 mg/l and 0.1 mg/l for TN and TP respectively.

The proposed "Backstop TMDL's" will require the Authority to construct additional treatment units to remove TN and TP down to the limits of current technology. Additionally to achieve compliance below those limits the Authority would likely then purchase TN and TP credits as needed. The additional costs to do this are unknown at this time but surely run into the millions of dollars to construct such facilities. Operations and maintenance costs increases would result as well.

The Authority is already facing increased O&M costs for wastewater treatment in 2011 due to the impending increases in electric and natural gas utility rates. These utilities are expected to increase in the 15-20% range. These utility rates will affect the Authority's residential, commercial and institutional users as well.

In light of the present economic uncertainties, the Authority considers it infeasible to construct and operate additional treatment facilities to achieve the "Backstop TMDL" limits proposed by the U.S. EPA unless grant funds are made available to cover the entire cost of such a project.

The Authority believes it is in the public interest to allow the Commonwealth's Chesapeake Bay Tributary Strategy to be implemented and then to measure and assess the improvements to the Bay and its tributaries before embarking on further expenditures of public funds that may not have any impact whatsoever on the Bay and its water quality.